



January 10, 1989

H. G. Weil  
163 Candlewick Lane  
Bridgewater, N.J. 08807

Chief, Site Investigation and Compliance Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency  
26 Federal Plaza  
New York, New York 10278

Attention: SCP - Carlstadt Project Officer

Dear Sir:

Attached is the December 1988 Progress Report for the RI/FS project at the SCP Carlstadt site. This report has been prepared by Dames & Moore, on behalf of the Committee representing the Respondents named in the Administrative Order on Consent No. II CERCLA-50114, in accordance with Paragraph 28B of the Order. Also attached is the December, 1988 Progress Report for the First Operable Unit FS, prepared by ERM. Please call me if you have any questions.

Very truly yours,

*H. G. Weil*  
H. G. Weil

HGW/smd/176+

Attachments

CC: Chief, Superfund Branch  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Room 437  
26 Federal Plaza  
New York, New York 10278

W. Warren  
Cohen, Shapiro, et. al.

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ATTACHMENT 1

SCP RI/PS PROGRESS REPORT  
DECEMBER, 1988

PROGRESS AND STATUS

1. The USEPA's conditional approval of Project Operations Plan (POP) Revision Numbers 8 and 9 was received by Dames & Moore on December 3.
2. The roll-off containing Tank T-5 was covered with a tarp on December 7. A drum adjacent to the roll-off was overpacked.
3. Meetings were held on December 13 with the owners of off-site properties on which wells will be installed. The purpose of the meetings was to finalize arrangements for the upcoming work.
4. The Dames & Moore field team and the drilling crew mobilized to the site on December 19 to begin off-site well installation. Problems with on-site utilities (particularly water) led to a postponement of the field program until the problems were resolved. The work was re-scheduled for the first week in January, with a second drill rig added (when available) to expedite the work.

TECHNICAL ISSUES

As stated above, implementation of POP Revision Nos. 8 and 9 will commence on January 3, 1989. The well installation should be completed before the end of January (weather permitting).

PLANNED ACTIVITIES - JANUARY 1989

1. Complete the field work for the installation of the off-site wells and the on-site bedrock well.

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-- PRIVILEGED AND CONFIDENTIAL --

PROGRESS REPORT  
SCP CARLSTADT/FIRST OPERABLE UNIT FS

Period: December 1988

A. Feasibility Study Activities -

- Drafted the Operable Unit Feasibility Study Work Plan for conducting an FS to remediate and/or control on-site sources of contamination and includes treatability studies for testing solidification, extraction and thermal technology options for treating contaminated soil and sludge. A draft Plan was prepared 2 December 1988 for the PRP Group review and comments, then a modified version of the Plan was submitted to the USEPA/NJDEP on 16 December 1988. At the 21 December 1988 Project Meeting with the USEPA/NJDEP and their consultants, they provided verbal comments and input on the FS Work Plan but informed us that formal comments will be submitted later. It was agreed that the FS tasks and treatability studies could proceed without a revised FS Work Plan, however, the work effort must satisfy the concerns raised by the USEPA/NJDEP.
- The Task 1, Identification of Preliminary Remedial Technologies has been initiated with detailed review of existing FS documentation and RI data and plans prepared by Dames & Moore, and review of the Public Health Assessment prepared by Terra, Inc. regarding assessment of risks posed by the site. The feasible technologies Array Document has been accessed to compare the ERM identification of potential technologies with those examined by Dames & Moore. After establishing the FS objectives for remediation of contaminant sources, ERM has generated a Technology List for each remedial response action regarding soils (and sludge) and the water table aquifer.

- The Treatability Study effort initially involved preparation of appropriate sampling and health/safety documents to collect sufficient quantities of contaminated materials for shipment to testing vendors throughout the country. Also the ERM staff contacted a number of potential vendors in each category of testing to determine which vendors could meet our schedule, perform the tests specified in the FS Work Plan, and offer a reasonable cost for their work (reference attached summary).

Based on the ERM effort to date and upon discussions with the PRP Group Project Manager, the testing vendors which can perform the defined scope of work are:

- Hazcon, Inc (Brookshire, Texas) to conduct solidification tests.
- Enreco, Inc. (Amarillo, Texas) to conduct solidification tests.
- Biotrol Corp. (Chaska, Minnesota) to conduct contaminated extraction tests.
- Energy and Environmental Resources (EER) in Irvine, California to conduct a test burn to evaluate a thermal destruction remedy.

The Health and Safety Plan prepared by ERM supplemented those provisions established by Dames & Moore, and added an extra measure of protectiveness for collecting highly contaminated materials on site. The draft Plan was submitted to the USEPA/NJDEP by letter dated 30 December 1988.

The Treatability Study Sampling Plans is being prepared in-house and is based on the POP document prepared by Dames & Moore. It will represent Revision Number 10 to the original POP and will establish specific procedures for collecting large quantities of sample and the compositing of highly contaminated materials to be placed in containers for shipment to the above testing vendors. The Sampling Plan will be completed upon a determination as to the packaging and shipping requirements for treatability type samples.

- The detailed Scopes-of-Work for the proposed solidification, contaminant extraction, thermal

destruction and ground water tests are completed but must be thoroughly reviewed to cover the Work Plan requirements and be specific enough for the testing vendors to follow, especially in terms of the results anticipated.

B. Project Schedule - Initiated on 12/5/88

The FS Task 1 activities are underway and we anticipate that the technologies identification and screening will be completed on schedule.

Task 1 completion end of week No. 5 or 1/6/89.

The Treatability samples are currently scheduled for collection during the first week of January 1989, however, the sample packaging/shipping issue could delay the entire effort.

Sample collection during week No. 5 or 1/6/89.

The Treatability vendors are scheduled to receive the samples for testing by week No. 6.

Tests to be completed by week No. 10 or the deadline of 2/10/89.

C. Planned Activities for January 1989.

Task 1 of the FS will be completed and result in the identification of feasible technologies to be grouped and combined into remedial alternatives under Task 2. The development of alternatives will be accomplished utilizing the evaluations under Task 1 and the information and data available from the treatability tests. ERM, will maintain the status of all vendor activities during the testing period. Task 3 is scheduled to be initiated late in January 1989 to take the remedial alternatives developed and subject that list to another screening step wherein specific criteria are applied to each alternate for further evaluation.

Treatability testing will be monitored by ERM to ensure that appropriate procedures are being followed and the data or results are useful for the FS. It is anticipated that additional testing for ground water treatability will be performed to evaluate the following treatment technologies:

- conduct an accelerated column test to determine the application of granular activated carbon.
- conduct a pilot-scale steam stripping test to determine the effectiveness of a physical treatment system.
- conduct a bench-scale test for super critical fluid extraction using carbon dioxide under pressure.
- conduct a pilot-scale test using an ultra-violet light and hydrogen peroxide treatment unit.